

EHR INCENTIVE PROGRAM

PROGRAM UPDATE





June 20, 2012

The Colorado Department of Health Care Policy and Financing (the Department) is now accepting attestations for the Colorado Medicaid EHR Incentive Program, in which eligible health care professionals and hospitals can receive up to \$63,750 in incentive payments for the adoption and meaningful use of certified EHR technology.

More than 300 Attestations Being Reviewed for Payment

Due to high interest in the Medicaid EHR Incentive Program, the Department has received more than 300 attestations since it began accepting them on March 5, 2012. Once an attestation is received by the Department, it is reviewed for accuracy and completeness. If important information appears to be missing from the attestation, it is "pended" back to the submitter to update. If it passes the review process, the Department issues a payment to the attesting provider.

Payment Status and Timeframe

The Department is reviewing attestations in chronological order by the date the attestation was submitted and cannot give specific updates as to the status of submitted attestations. Please note that from the day an attestation is submitted, it can take up to 60 days to review and approve the attestation as well as an additional 45 days from the approval date to receive payment, per the Centers for Medicare and Medicaid Services (CMS) regulations. This is a total of 105 days between both processes. Additionally, if an attestation is pended back to an Eligible Professional or Eligible Hospital this timeline starts over from the day that the attestation is re-submitted.

Avoid a Pended Attestation by Attaching Supplemental Documentation

In the event that the Department cannot verify self-reported data in the <u>Colorado Registration & Attestation System</u> (CO R&A), the Department will "pend" attestations back to Eligible Professionals, Hospitals and Group Representatives.

Required Documentation

There are several required documents that must be uploaded into the CO R&A by an Eligible Professional, Eligible Hospital, or Group Representative. The Department requires these documents for verification purposes. Any attestation missing required documentation will be pended back. The required documents include:

- Eligible Professionals Only Eligibility Workbook;
- **Eligible Hospitals Only** Four years of hospital cost reports & the <u>Incentive Payment Calculation Workbook</u> identifying the line items in the cost reports used to calculate the Medicaid EHR Incentive payment amount;
- Group Representatives using Group Medicaid Volume only Group Eligible Workbook;
- All Eligibles: Contract or license agreement with the CMS Certification Number identified in the document; and
- All Eligibles: A signed Attestation Agreement.



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Additional Documentation

In the event that the Department cannot verify self-reported data reported by Eligible Professionals, Eligible Hospitals and Group Representatives within the CO R&A, the Department will pend the attestation back to the attesting professional or organization with a request for additional information. Pended attestations could potentially delay the receipt of incentive payments.

To decrease the likelihood that your attestation will be pended back to you, it may be beneficial for Eligible Professionals, Eligible Hospitals, and Group Representatives to attach additional documentation in the CO R&A, as it specifically relates to their individual attestation. These *optional* documents include, but are not limited to:

- Copy of Board Certification, especially Pediatricians utilizing Medicaid volume between 20-30%;
- Proof of PA-led FQHC/RHC in the case of a Physician Assistant attesation
- Medicaid encounter volumes validation in Word of Excel format, including a list of encounters identifying Medicaid Client ID, Date of Service and Medicaid Billing ID – NO Protected Health Information;
- Identification of specific cost report line items used to calculate Incentive Payment Calculation information for Eligible Hospitals; and
- Additional proof of adoption, implementation or upgrade, including a work plan, proof of data entry, etc.

If you have any questions regarding the type of documentation that is optional, but may be helpful to the Department during their review of your attestation, please contact the Medicaid EHR Incentive Program Coordinator at MedicaidEHR@corhio.org.

Reminder Regarding Post-Payment Audits for Medicaid EHR Incentive Program

As a reminder, the Department will begin post-payments audits for Medicaid EHR Incentive payments made to Eligible Professionals and Eligible Hospitals in the summer of 2012. In order to prepare yourself or your organization for a potential audit, the Department is requesting that Eligible Professionals and Hospitals receiving an incentive payment (in any given year) to keep all documentation relating to incentive payments for up to seven years after an incentive payment is received. Although audits are expected to be made in a timely manner, the State Medicaid HIT Plan (SMHP) indicates that post-payment audits may occur up to seven years after an incentive payment is made under the Medicaid EHR Incentive Program.

Schedule an Outreach Event

In partnership with the Department, CORHIO offers outreach events throughout the State of Colorado to help educate potential Eligible Professionals and Eligible Hospitals about the Colorado Medicaid EHR Incentive Program. If you believe



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an on-site or web-based education session would be beneficial to your group, please contact the Colorado Medicaid EHR Incentive Program Coordinator at MedicaidEHR@corhio.org or 720-285-3232 to schedule an outreach event.

Updated Anticipated Timeline - Colorado Medicaid EHR Incentive Program

Event	Expected Date
CMS Registration Opened for Colorado Participants	Now Open!
Colorado Registration & Attestation System live; Medicaid Provider Attestation Begins for AIU	Now Open!
First Incentive Payments Issued to EPs and EHs who Successfully Attest to Adopting, Implementing, or Upgrading Certified EHRs	Paid!
Colorado Registration & Attestation System begins accepting Meaningful Use Attestations	Sept 2012
CO R&A Opens for EHs to Attest to Meaningful Use for Federal Fiscal Year 2013	Jan 2013
CO R&A Opens for EPs to Attest to Meaningful Use for Calendar Year 2013	April 2013

Medicaid Program Point of Contact and Partnerships

The Department has partnered with CORHIO and the Colorado Regional Extension Center (CO-REC) program to provide program coordination and assist with provider communications and outreach regarding the Medicaid EHR Incentive Program. The Medicaid EHR Incentive Program Coordinator will be the central point of contact for eligible providers, partners, and other interested parties on requirements, processes, and questions regarding the Medicaid EHR Incentive Program.

Colorado Medicaid EHR Incentive Program Contact Information:

Betsy Baker, Medicaid EHR Incentive Program Coordinator

MedicaidEHR@corhio.org

720-285-3232

Xerox (formally Affiliated Computer Services) has been contracted by the Department to manage the Provider Outreach Page and to provide the CO R&A system, including the web portal through which eligible providers can register and attest to receive their EHR incentive payments. Xerox has previously implemented this solution in many other states, including California, Alaska and Texas.